

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION AT CLEVELAND**

IN RE: SONIC CORP. CUSTOMER DATA	)	MDL Case No. 1:17-md-02807-JSG
BREACH LITIGATION	)	
(Financial Institutions)	)	Hon. District Judge James Gwin
	)	
THIS DOCUMENT RELATES TO ALL	)	Hon. Magistrate Judge Jonathan Greenberg
FINANCIAL INSTITUTION ACTIONS	)	
	)	

**JOINT STIPULATION CONTINUING PRETRIAL DISCLOSURE DEADLINE**

The Parties, through their respective counsel, stipulate to the following regarding the pretrial disclosure deadline for this matter:

1. In accordance with this Court's Order at the July 1, 2021 status conference, the Parties exchanged expert reports on July 23, 2021.

2. The Parties are working diligently to complete expert discovery in this matter as expeditiously as possible, and the Parties have scheduled depositions for each of Plaintiffs' three expert witnesses. Matthew Strebe's deposition occurred on August 20, 2021; Neil Librock's deposition is scheduled for August 27, 2021; and Ian Ratner's deposition is scheduled for September 1, 2021.

3. Based on this deposition schedule, the Parties have agreed to exchange their expert rebuttal reports by September 14, 2021.

4. The Court has scheduled this case for trial on the two-week standby period beginning October 11, 2021. While the Court has not set a deadline for completion of discovery, Federal Rule 26 requires the Parties to make their pretrial disclosures at least 30 days before trial. *See* Fed. R. Civ. P. 26(a)(3)(B). Based on the October 11 "trial-ready" date, the current pretrial disclosure deadline is Friday, September 10.

5. The Parties agree that all discovery in this case must be completed prior to the pretrial disclosure deadline. However, the September 10 deadline does not allow the Parties sufficient time to evaluate the rebuttal reports and depose expert rebuttal witnesses. Therefore, the Parties agree and stipulate that an extension of the September 10 pretrial disclosure deadline is necessary to provide enough time to complete expert discovery.

6. Pursuant to the Parties' stipulation, the Parties respectfully request that the Court strike and continue the September 10, 2021 pretrial disclosure deadline an additional three weeks—to and including October 1, 2021.

Dated: August 24, 2021

Respectfully submitted,

/s/ Charles H. Van Horn (with consent)

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